

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

*In re:* APPLICATION OF ISAAC LEVI PILANT,  
FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782  
TO CONDUCT DISCOVERY FOR USE IN A  
FOREIGN PROCEEDING

Case No. 1:25-mc-00760-JMA-LKE

**RESPONDENTS' CONSENT MOTION FOR EXTENSION OF TIME  
AND PROPOSED BRIEFING SCHEDULE**

Pursuant to Fed. R. Civ. P. 6, Respondents Democracy for the Arab World Now., Inc. and Sarah Leah Whitson respectfully seek an extension of time to respond to the Court's March 4, 2025 Order. Petitioner consents to this motion and, as shown below, good cause exists for granting the motion. No prior extensions have been sought or granted in this matter.

On February 24, 2025, Petitioner initiated the instant action by filing a Motion for Discovery Under 28 U.S.C. § 1782. ECF No. 1. On March 3, 2025, the Honorable Judge Joan. M. Azrack referred the motion to this Court, and on March 4, 2025, the Court denied Petitioner's request to grant the motion *ex parte* "[i]n light of the complexity of the issues presented" and directed Petitioner to serve the motion on Respondents. Service occurred on March 6, 2025, ECF No. 8, after which Respondents commenced a search for counsel to represent them in this matter.

Respondents met and conferred with undersigned counsel for the first time and retained their services yesterday, March 19, 2025. Undersigned counsel immediately contacted Petitioner's counsel to request consent to file the present motion for extension of time. Petitioner consented to the motion, and counsel for the parties agreed upon a proposed briefing schedule.

Respondents respectfully submit that the requested extension is needed for undersigned counsel to adequately research and prepare a response to the pending Motion for Discovery that will aid the Court in its determination of the complex and important issues presented therein. For these reasons, and for good cause being shown, Respondents respectfully request an extension on consent and propose the following briefing schedule as agreed upon by the parties:

**April 18, 2025 – Respondents’ response due**

**May 9, 2025 – Petitioner’s reply, if any, due**

DATED: March 20, 2025

Respectfully submitted,

/s/ Timothy Grinsell

Timothy Grinsell  
Margot Hoppin  
Hoppin Grinsell LLP  
11 Hanover Street Ste. 703  
New York, NY 10005  
(646) 475-3550  
tim@hoppinggrinsell.com

Jake Karr  
(*petition for admission forthcoming*)  
Technology Law & Policy Clinic  
New York University School of Law  
245 Sullivan Street  
New York, NY 10012  
(212) 998-6042  
jake.karr@nyu.edu

*Counsel for Respondents*